

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
Blue Ridge Regional Office

INTRA-AGENCY MEMORANDUM

Permit Writer	L.J. Alexander			
Memo To	Air Permit File	Date	FINAL DRAFT	
Facility Name	GP Big Island, LLC			
Registration Number	30389 (ceds 19)			
County-Plant I.D.	019-0003			
UTM Coordinates (Zone 17)	645.1	Easting (km)	4155.2	Northing (km)
Elevation (feet)	820			
Distance to Nearest Class I Area (select one)		SNP (km)	5.9	JRF (km)
FLM Notification (Y/N)	Y ¹	Required if less than 10K (minor), 100K (state major)		
NET Classification (A, SM, B)	A	Before permit action	no change	After permit action
Title V Major Pollutants	PM/PM ₁₀ NO _x , SO ₂ CO,VOC	Before permit action	no change	After permit action
PSD Major Source (Y/N)	Y	Before permit action	no change	After permit action
PSD Major Pollutants	PM/PM ₁₀ NO _x , SO ₂ CO,VOC	Before permit action	no change	After permit action

I. Introduction

GP Big Island, LLC (GP) owns and operates a non-sulfur, non-bleaching pulp and paper mill in Big Island. The facility is located approximately 12 miles northwest of Lynchburg, VA in Bedford County along the James River. The mill produces corrugating medium from semi-chemical (sodium carbonate/sodium hydroxide) hardwood pulp and recycled fiber and linerboard from recycled fiber.

GP became subject to requirements of Best Available Retrofit Technology (BART) when air dispersion modeling demonstrated a visibility impact above 0.5 deciviews on the nearby James River Face Wilderness Area. The company was required to investigate the technical feasibility and economic impact of adding or replacing control equipment on BART-subject emission units (units installed between 1962 and 1977). The BART program is authorized under the federal regional haze regulations, 40 CFR 51.300 to 308.

This permit action is a reopening by DEQ to remove the #4 boiler (PWR04) from GP's BART State Operating Permit (SOP). The initial BART SOP was issued on June 12, 2008. The revised SOP will then be incorporated into the SIP.

II. Emission Unit(s) / Process Description(s)

GP has two emission units subject to BART: the #4 boiler (PWR04) and the #5 boiler (PWR05). PWR04 is a pulverized coal boiler. PWR05 is a multi-fuel stoker boiler burning wood, paper waste and coal.

¹ Via email August 7, 2012. See also §X of this analysis.

PWR04 was included in the initial BART SOP issued on June 12, 2008. Since that time, GP has formally shut this boiler down by disconnecting it and signing a mutual determination for permanent shut down of a stationary source emissions unit. The mutual determination was signed by GP on January 4, 2012 and by DEQ on January 5, 2012. PWR05 will be the only remaining emissions unit in the BART SOP. All conditions relating to PWR04 will be removed from the permit. All conditions relating to PWR05 will remain in the permit with no changes.

III. Regulatory Review

A. 9VAC5 Chapter 80, Part II, Article 6 – Minor New Source Review

Reopening this State Operating Permit does not initiate anything associated with Article 6.

B. 9VAC5 Chapter 80, Part II, Article 8 - PSD Major New Source Review and Article 9 – Nonattainment Area Major New Source Review

Bedford County is a PSD area for all pollutants as designated in 9VAC5-20-205. GP is a PSD major source as the PTE of PM/PM-10, CO, NO_x, SO₂ and VOC exceed 250 tons per year. Reopening this State Operating Permit does not initiate PSD review.

C. 9VAC5 Chapter 50, Part II, Article 5 - NSPS

PWR05 is not subject to any NSPS (Db or Dc).

D. 9VAC5 Chapter 60, Part II, Article 1 - NESHAPS

PWR05 is not included in any source types covered by 40 CFR Part 61.

E. 9VAC5 Chapter 60, Part II, Article 2 - MACT

PWR05 is in a source category subject to a MACT, Commercial and Institutional Boilers and Process Heaters. No requirements for the Boiler MACT (5D) are included in this permit revision.

F. State-Only Enforceable Under 9VAC5-80-1120 F

No State-Only enforceable conditions are required in the permit.

G. 9VAC5 Chapter 80, Part II, Article 5 - State-Operating Permits

The BART program has been implemented by DEQ through issuance of State Operating Permits which are then incorporated into the SIP. Removal of PWR04 from the original BART permit dated June 12, 2008 is being processed as a reopening to the State Operating Permit as provided in 9VAC5-80-960 and 9VAC5-80-1000.

IV. Best Available Control Technology Review (BACT) (9VAC5-50-260)

BACT review is not applicable for this permit revision.

V. Summary of Actual Emissions Increase

No emissions increases are expected as a result of this permit revision.

VI. Dispersion Modeling

- A. Regulated Pollutants
Not required.
- B. Toxic Pollutants
Not required.

VII. Boilerplate Deviations

Permit is reopened to remove conditions related to PWR04 from the June 12, 2008 permit.

VIII. Compliance Demonstration

Compliance will continue to be demonstrated by recordkeeping and as required by the permit.

IX. Title V Review - 9VAC 5 Chapter 80, Part II, Article 1

GP is a Title V major facility. This revision will not affect GP's Title V status.

X. Other Considerations

FLM Notification – USDA Forest Service² was given an opportunity to review the draft permit. They had no comments.

Public Notice – The public participation requirements of 9VAC5-80-1020 apply to permits that are reopened (see 9VAC5-80-1000 B). In addition the final permit will go to public notice as a part of the SIP revision process.

Permit Fees – Permit fees are not required for permit reopening.

XI. Recommendations

Recommend approval of permit as drafted.

Attachments

none

² Melanie Pitrolo (mpitrolo@fs.fed.us)